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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC. SECURITIES  
LITIGATION

T. ROWE PRICE GROWTH STOCK FUND,  
INC., et al.

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants,

EQUITY TRUSTEES LIMITED AS  
RESPONSIBLE ENTITY FOR T. ROWE  
PRICE GLOBAL EQUITY FUND, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL

Master File No. 15-cv-07658-MAS-LHG

Civil Case No. 16-cv-05034-MAS-LHG

Civil Case No. 16-cv-06127-MAS-LHG

PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants,

PRINCIPAL FUNDS, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants,

BLOOMBERGSEN PARTNERS FUND, LP,  
et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants,

PENTWATER EQUITY OPPORTUNITIES  
MASTER FUND LTD., ET AL.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL

Civil Case No. 16-cv-06128-MAS-LHG

Civil Case No. 16-cv-07212-MAS-LHG

Civil Case No. 17-cv-07552-MAS-LHG

PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH JORN,  
ARI S. KELLEN, and TANYA CARRO,

Defendants.

**INDIVIDUAL ACTION PLAINTIFFS' NOTICE OF JOINDER TO  
CLASS PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO STAY**

Pursuant to this Court's Order to Show Cause (ECF No. 273), Plaintiffs in the five above-captioned individual actions ("Individual Action Plaintiffs"), hereby respectfully join in the arguments set forth in Plaintiffs' Memorandum of Law in Opposition to Stay, filed in the related securities class action case, *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*, Master File No. 15-cv-07658-MAS-LHG (ECF No. 279).

For the reasons set forth in the stay opposition brief filed by the class plaintiffs, the Individual Action Plaintiffs respectfully submit that the Court should not stay the above-captioned civil proceedings. A stay of document discovery is particularly unwarranted. Staying document discovery would neither serve the interests of justice, nor facilitate the just and speedy determination of these civil actions. *See Fed. R. Civ. P. 1.* Further, allowing document production to proceed would cause no prejudice to the parties in these actions or to non-parties Gary Tanner and Andrew Davenport in their criminal proceedings.

Dated: November 3, 2017

Respectfully submitted,

**CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.**

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